# UNITESD STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

AMORY BOOKER	
Plaintiff	
V.	CA No. 1:17-cv-10717-LTS
ROBERT HIERHOLCER	
Defendant	

#### PROPOSED PRETRIAL SCHEDULE

Pursuant to L.R. 16.1 and the Court's order (Doc. 17), the parties jointly submit the following proposed pre-trail schedule.

**Initial Disclosures**. Initial Disclosures per Fed. R. Civ. P. 26(a)(1) completed by November 1, 2017.

**Amendments to Pleadings**. No motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after March 1, 2018.

## **Fact Discovery - Interim Deadlines**

All requests for production of documents must be served by December 1, 2017.

All requests for admissions must be served by May 1, 2018.

All depositions, other than expert depositions, must be completed by April 1, 2018.

Final Fact Discovery Deadline May 1, 2018

## **Expert Discovery**

Trial experts for the party having the burden of proof must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed by June 1, 2018.

Rebuttal trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed by July 1, 2018.

All trial experts must be deposed by August 1, 2018.

**Dispositive Motions** must be filed by September 1, 2018 with opposition due thirty days thereafter.

PLAINTIFF, AMORY BOOKER, By His Attorney,

/s/ John R. Bita III John R. Bita III (BBO 667886) Tempus Fugit Law LLC 183 State Street, Floor 2 Boston MA 02109 617-752-2371 johnb@tflawllc.com DEFENDANT, ROBERT HIERHOLCER By His Attorneys,

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#### **CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified in the Notice of Electronic Filing (NEF) on September 20, 2017. All parties are represented by registered participants. /s/ John R. Bita III